

1 JOSEPH P. RUSSONIELLO
2 United States Attorney

ORIGINAL
FILED

AUG 7 2008

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SEALED
BY COURT ORDER

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8 IN THE UNITED STATES DISTRICT COURT FOR THE
9 NORTHERN DISTRICT OF CALIFORNIA
10 OAKLAND DIVISION

CW
MHP

11
12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 JOHN KEVIN THOMPSON,

16 Defendant.

CR 08

No. CR-

0526

17
18 VIOLATIONS:

18 U.S.C. § 1341— Mail Fraud (1 Count);
18 U.S.C. § 1343— Wire Fraud (2 Counts);
18 U.S.C. § 1957(a) — Money Laundering
Laundering (5 Counts)

OAKLAND VENUE

19 INDICTMENT

20 The Grand Jury charges:

21 BACKGROUND

22 1. At times relevant to this indictment, JOHN KEVIN THOMPSON, was a resident
23 of Escalon, California.

24 2. In or about January of 2004 through in or about June of 2004, both dates being
25 approximate and inclusive, in the Northern District of California and elsewhere, the defendant,

26 JOHN KEVIN THOMPSON,
27 devised and intended to devise a scheme and artifice to defraud and to obtain money by means of
28 false and fraudulent pretenses, representations, and promises, well knowing that the pretenses,
representations and promises were false and fraudulent when made.

1 COUNT ONE: (18 U.S.C. § 1341 – Mail Fraud)

2 1. On or about March 24, 2004, in the Northern District of California, the defendant,
3 JOHN KEVIN THOMPSON,
4 then operating a business located in Pleasanton, California, did willfully and knowingly devise
5 and intend to devise a scheme and artifice to defraud and to obtain money and property by means
6 of materially false and fraudulent pretenses, representations and promises, well knowing at the
7 time that the pretenses, representation and promises were materially false and fraudulent when
8 made, and for the purpose of executing such scheme and artifice, caused the use of the United
9 States mails or by private or commercial interstate carrier in that D.T. sent from Newport Beach,
10 California, contract documents for investing in the defendants' recruiting service company to
11 D.T.'s attorney who is located in Palo Alto, California in the Northern District of California.

12 In violation of Title 18, United States Code, Section 1341.

13 COUNTS TWO THROUGH THREE: (18 U.S.C. § 1343 – Wire Fraud)

14 3. On or about March 25, 2004 in the Northern District of California, the defendant,
15 JOHN KEVIN THOMPSON,
16 then operating a business located in Pleasanton, California, did knowingly devise and intend to
17 devise a scheme and artifice to defraud and to obtain money and property by means of materially
18 false and fraudulent pretenses, representations and promises, well knowing at the time that the
19 pretenses, representations and promises were materially false and fraudulent when made, and for
20 the purpose of executing such scheme and artifice, caused to be transmitted by means of wire
21 communications in interstate commerce, the wire transfers identified below:

COUNTS	DATE	MONETARY TRANSACTION
TWO	03/25/04	D.T. wired \$300,000 from his Bank of America Acct. #xxxxxx2586 to Bank of Walnut Creek Acct. # xxxxx031
THREE	03/25/04	I.R. wired \$300,000 from his Greater Bay Bank Acct. # xxxxxx005 to Bank of Walnut Creek Acct. # xxxxx031

26 Each in violation of Title 18, United States Code, Section 1343.

27 COUNTS FOUR THROUGH EIGHT: (18 U.S.C. § 1957(a) – Money Laundering)

28 4. On or about March 25, 2004, through on or about April 5, 2004, in the Northern

District of California, the defendant,

JOHN KEVIN THOMPSON,

then operating a business located in Pleasanton, California, did willfully and knowingly engage in monetary transactions in criminally derived property of a value greater than \$10,000, as described in Counts Four through Eight below, said property being derived from a specified unlawful activity, namely, mail and wire fraud, as alleged in Counts One through Three:

COUNTS	DATE	MONETARY TRANSACTION
FOUR	03/25/04	Purchase of \$297,000 Cashier's Check to pay F.H.
FIVE	03/25/04	Purchase of Cashier's Checks for \$153,000
SIX	03/25/04	Payment to S.L. for \$27,823
SEVEN	03/29/04	Electronic transfer of \$55,800 to Acct.# xxxx275
EIGHT	04/05/04	Check payment to A.T. for \$15,868

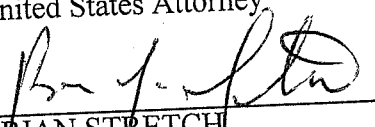
Each in violation of Title 18, United States Code, Section 1957(a).

A True Bill


Dated: _____

FOREPERSON

JOSEPH RUSSONIELLO
United States Attorney


BRIAN STRETCH
Assistant United States Attorney
Chief, Criminal Division

Approved as to Form


THOMAS MOORE
Assistant United States Attorney